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6

7 **UNITED STATES BANKRUPTCY COURT**  
8 **WESTERN DISTRICT OF WASHINGTON, TACOMA DIVISION**  
9

10 In re:

11 Yvonne Inez Davis,

12  
13 Debtor(s).  
14  
15  
16  
17

Bankruptcy Case No. 16-40664-BDL

Chapter 13

**NOTICE OF DEBTOR'S REQUEST FOR  
TEMPORARY FORBEARANCE DUE TO  
THE COVID-19 EMERGENCY**

18 Now comes Pingora Loan Servicing, LLC ("Creditor"), by and through undersigned counsel,  
19 and hereby submits this Notice to the Court as notice that due to a recent financial hardship resulting  
20 directly or indirectly from the COVID-19 emergency, the Debtor has requested – and Creditor has  
21 provided – a temporary suspension of mortgage payments.

22 The Debtor recently contacted Creditor requesting a forbearance period of 6 months which  
23 allows Debtor to elect to not tender mortgage payments to Creditor that would come due on the  
24 mortgage starting 10/01/2020 through 03/01/2021. During this forbearance period, all terms and  
25 provisions of the mortgage note and security instrument, other than the payment obligations, will  
26 remain in full force and effect unless otherwise adjusted by this court or through a loan modification.

27 Per the request, Debtor will resume Mortgage payments beginning 04/01/2021 and will be  
28 required to cure the delinquency created by the forbearance period. During the forbearance period

1 and up to and including the time when that period ends, Creditor will work with the Debtor, the  
2 Debtor's attorney (if applicable) and the bankruptcy trustee on how to address the suspended  
3 payments in the long-term, including obtaining any necessary court consent and approval. This  
4 Declaration does not constitute an amendment or modification to the Debtor's plan of  
5 reorganization, and does not relieve the Debtor of the responsibility to amend or modify the plan or  
6 reorganization to reflect the forbearance agreement, if required.

7 If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves it  
8 rights to seek relief from the automatic stay upon expiration of the forbearance period. Creditor may  
9 continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

10 DATED: October 16, 2020

Respectfully Submitted,  
MALCOLM ♦ CISNEROS, A Law Corporation  
*/s/ Nathan F. Smith*

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Nathan F. Smith #43160  
Attorneys for Pingora Loan Servicing, LLC

## PROOF OF SERVICE

I am employed by the law firm of Malcolm & Cisneros in the county of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 2112 Business Center Drive, Irvine, California 92612

On October 16, 2020, I caused to be served the document entitled: **NOTICE OF DEBTOR'S REQUEST FOR TEMPORARY FORBEARANCE DUE TO THE COVID-19 EMERGENCY**

on the following interested parties:

|  |  |
|--|--|
| <b>Debtor(s):</b><br><b>Yvonne Inez Davis</b><br><b>1332 East 43rd St</b><br><b>Tacoma, WA 98404</b>   | <b>Debtor(s) Attorney:</b><br><b>Ellen Ann Brown</b><br><b>Brown and Seelye PLLC</b><br><b>1700 Cooper Point Rd SW #C5</b><br><b>Olympia, WA 98502</b> |
| <b>TRUSTEE:</b><br><b>Michael G. Malaier</b><br><b>2122 Commerce Street</b><br><b>Tacoma, WA 98402</b> | <b>U.S. Trustee</b><br><b>United States Trustee</b><br><b>700 Stewart St Ste 5103</b><br><b>Seattle, WA 98101</b>                                      |

☒ (By Mail) I caused each envelope, with postage prepaid, to be placed in the United States Mail at Irvine, California

☐ (By Hand) I caused each envelope to be delivered by hand

☐ (By Overnight Courier) I caused each envelope, with postage prepaid, to be sent by Federal Express/Express Mail.

☐ (By Facsimile Transmission) I caused each document to be sent by automatic facsimile transmission to the following telephone numbers and confirmed by voice communication that the transmission was received:

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction service was made and that the foregoing is true and correct and this declaration was executed on the date indicated below at Irvine, California.

Dated: October 16, 2020

/s/ Diep Quach

Diep Quach